

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA**

RE: AMY NICOLE WALGE

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CHAPTER 13  
CASE NO. 23-60206

Debtor(s)

**MOTION TO EXTEND AUTOMATIC STAY  
AND NOTICE OF OPPORTUNITY FOR HEARING**

The Debtor(s), by Counsel, pursuant to Bankruptcy Code Section 362 and state as follows:

1. That on 2/23/2023, the Debtor(s) filed in this Court a Petition under Chapter 13 of the US Bankruptcy Code.
2. The Debtor's previous bankruptcy cases are as follows:  
Case Number 15-50581, Chapter 13 filed in Virginia Western Bankruptcy Court on 06/05/2015, Dismissed for Failure to Make Plan Payments on 09/04/2019; Case Number 19-50836, Chapter 13 filed in Virginia Western Bankruptcy Court on 09/25/2019, Dismissed for Failure to Make Plan Payments on 02/01/2023.
3. Due to the dismissal of the previous case, the automatic stay will expire 30 days after the date of filing this new petition.
4. The Debtor(s) is requesting that the Court extend the automatic stay for the following reason(s). The Debtor's previous case was dismissed due to the following circumstances. In the previous case, the Debtor incurred new expenses including medical bills. The Debtor's vehicle also broke down and she could not afford to fix it and maintain her bankruptcy payments. As a result, she let the case be dismissed. In the present case, her chapter 13 plan payments is \$100.00 per month which is more affordable and more feasible. She also surrendered the vehicle that broke down. Additionally, the debtor included all of her newly acquired debt. She receives monthly income from a steady job. She has agreed to automatic monthly payments from tfs. The debtor believes she can make this monthly payment each month.

**WHEREFORE**, your Debtor(s) prays that the Court, after notice and an opportunity for hearing, enter an Order extending the automatic stay until such time the Court deems otherwise.

Dated: 02/28/2023

By: /s/DAVID WRIGHT  
DAVID WRIGHT  
Cox Law Group  
901 Lakeside Drive  
Lynchburg, VA 24501

**NOTICE FOR HEARING**

Please take notice that the above named Debtor(s) have filed a Motion to Extend Automatic Stay, true copies of which are attached hereto, and shall submit the same to the Bankruptcy Judge, for approval on **03/23/2023 at 9:30 a.m.** or as soon thereafter as the parties can be heard, **by Zoom using URL <https://vawb-uscourts-gov.zoomgov.com/j/1603692643> and Meeting ID: 1603692643.**

I hereby, certify that I have this date mailed a true copy of the foregoing motion to all creditors on the mailing matrix in this case.

DATED: February 28, 2023

/s/ David E. Wright  
Counsel for Debtor(s)